TABLE OF CONTENTS

Page

Interest of the Soap and Detergent Association 1

Argument—The Decision Below Sanctions Local Regulations Which Unconstitutionally Burden that "Free Access to Every Market in the Nation" Which the Commerce Clause Was Adopted To Ensure 2

Conclusion 15

INDEX OF CITATIONS

CASES:

Bibb v. Navajo Freight Lines, Inc., 359 U.S. 520 (1959) 9, 10
Carter v. Carter Coal Co., 298 U.S. 238 (1936) 16
Fortner Enterprises v. United States Steel Corp., 394 U.S. 495 (1969) 12
Freeman v. Hewit, 329 U.S. 249 (1946)..2, 3, 7, 9, 11, 14, 15
Hood & Sons v. DuMond, 336 U.S. 525 (1949) 4, 6, 9, 15
Huron Portland Cement Co. v. Detroit, 362 U.S. 448 (1960) 10, 11
Kansas City So. Ry. Co. v. Kaw Valley Drainage District, 233 U.S. 75 (1914) 13
Labor Board v. Jones & Laughlin, 301 U.S. 1 (1937) .. 5, 7
Leisy v. Hardin, 135 U.S. 100 (1890) 4
Minnesota v. Barber, 136 U.S. 313 (1890) 14
Morgan v. Virginia, 328 U.S. 373 (1946) 3, 9
National Bellas Hess Inc. v. Department of Revenue, 386 U.S. 753 (1967) 9, 10, 11
Pike v. Bruch Church, Inc., 397 U.S. 137 (1970) 3, 4, 6
Schollenberger v. Pennsylvania, 171 U.S. 1 (1898) .. 4
Sligh v. Kirkwood, 237 U.S. 52 (1915) 4
Southern Pacific Co. v. Arizona, 325 U.S. 761 (1945) 9, 10, 11

U. S. CONSTITUTION:

Art. I, § 8, Cl. 3 .....2, 3, 4, 7, 11, 15, 16

MISCELLANEOUS:

Chafee, *Progress of the Law—Equitable Relief Against Torts*, 34 Harv. L. Rev. 388 (1921) 9

IN THE

Supreme Court of the United States

OCTOBER TERM, 1974

No. 74-1109

THE PROCTER AND GAMBLE COMPANY AND FMC CORPORATION, *Petitioners,*

v.

THE CITY OF CHICAGO, *Respondent.*

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT

BRIEF AMICUS CURIAE FOR THE SOAP AND DETERGENT ASSOCIATION

This brief *amicus curiae* is filed by the Soap and Detergent Association (SDA) with the consent of the parties, as provided for in Rule 42 of the Rules of this Court.

INTEREST OF THE SOAP AND DETERGENT ASSOCIATION

The Soap and Detergent Association is a national trade organization representing the manufacturers of

over 90 percent of the soap and detergents produced in the United States each year and their suppliers of raw material. Its more than 120 members include both the large and small factors in the industry.

It is these companies, most of which either utilize or produce phosphates, which are the targets of the ordinance challenged herein and it is these companies whose operations in interstate commerce are shackled by the patchwork pattern of regulation found by the trial court and described at p. 8, n. 5, *infra*. Petitioner Procter & Gamble has demonstrated the constitutionally significant costs imposed on it by the Chicago ordinance. SDA files this brief *amicus curiae* in order to put before the Court the additional insights available to it as the representative of both large companies such as Procter and the smaller detergent manufacturers who are even less able to adapt their production and transportation patterns, and even more financially vulnerable to restrictive legislation.

ARGUMENT

The Decision Below Sanctions Local Regulations Which Unconstitutionally Burden That "Free Access to Every Market in the Nation" Which the Commerce Clause Was Adopted To Ensure.

The Petition for Certiorari demonstrates that the "compromise" between this Court's precedents which the Court of Appeals fashioned herein compromises away the essential safeguards which the Commerce Clause erected against any state or local "action which may fairly be deemed to have the effect of impeding the free flow of trade between States." *Freeman* v. *Hewit*, 329 U.S. 249, 252. Although we agree with, we

shall not echo that analysis. Rather, we shall concentrate on the details of the Court of Appeals' treatment of the burden issue, for this will reveal at each step a dilution of the very concept of "burden on commerce". If that Court's approach to the Commerce Clause is accepted, approval of not only the Chicago anti-phosphate ordinance, but of any restrictive local regulation is inevitable, and it matters not whether the rubric articulated is that the burden is only "slight" (cf. Pet. A-10, A-15),[1] or is "indirect", or is overbalanced by the importance of local interest involved (cf. *Pike* v. *Bruce Church, Inc.*, 397 U.S. 137, 142).

1. We begin with the most obvious point. The Chicago ordinance absolutely forbids the sale of detergent products that contain phosphates. A more substantial interference with or burden on commerce than its total prohibition is logically inconceivable; yet the court below found "no merit" in the argument that this embargo burdens interstate commerce, because the "ordinance does not require that detergents be manufactured in Chicago or Illinois and does not benefit manufacturers who are located there" (Pet. A-12). But the view that the Commerce Clause protects interstate commerce only against discrimination in favor of local interests is untenable. As Mr. Justice Frankfurter explained in *Freeman* v. *Hewit, supra:*

> "This limitation on State power, as the Morgan case [*Morgan* v. *Virginia*, 328 U.S. 373] so well illustrates, does not merely forbid a State to single

---

[1] "Pet." refers to the Petition for Certiorari herein. The opinions of the Court of Appeals and the District Court will be referred to as Pet. A-1 *et seq.* and Pet. B-1 *et seq.*, as reprinted in the Petition.

> out interstate commerce for hostile action. A State is also precluded from taking any action which may fairly be deemed to have the effect of impeding the free flow of trade between States. It is immaterial that local commerce is subjected to a similar encumbrance." 329 U.S. at 252.

When this Court struck down embargoes on liquor and oleomargarine in *Leisy* v. *Hardin*, 135 U.S. 100 and *Schollenberger* v. *Pennsylvania*, 171 U.S. 1, there was not even a whisper about discrimination in the opinions.[2] To be sure, these are old cases, but this reflects not a diminution of their authority, but the common understanding that legislation of this character could not survive constitutional challenge. By holding that a law which excludes from a state legitimate articles of commerce[3] raises only an issue of substantive due process (Pet. A-12), the decision below invites renewed local experimentation in restricting that "free access to every market in the Nation" which the Commerce Clause was adopted to ensure. *Hood* v. *DuMond*, 336 U.S. 525, 539.

2. The court below disapproved the District Court's holding "that the ordinance burdened interstate commerce by impairing the normal operation of companies having interstate sales and requiring these companies to create new, and less direct, shipping routes"

---

[2] While two of the cases cited at Pet. A-12, n. 17 did involve discrimination against outsiders, the most recent of those cases, *Pike* v. *Bruce Church, Inc.*, 397 U.S. 137, did not, and militates strongly against the result reached below, see Pet. 15-16.

[3] *Sligh* v. *Kirkwood*, 237 U.S. 52, sustained a law which forbad export to other States of "impure foods, unfit for use", which were for that reason "not the legitimate subject of trade or commerce nor within the protection of the Commerce Clause of the Constitution" (*id.* at 59-60).

(Pet. A-10). The Court acknowledged "the fact that Procter and Gamble's plant in the Chicago area could not adequately supply its six-state area with detergents because the plant had to manufacture two lines of detergent products and thus reduce its capacity [so that] products had to be shipped to some of these states from plants which happened to be at different, and often further, locations" (*id.*). The precedents which establish that commerce was thereby burdened, were dismissed out of hand on the ground that this case does not "involve interstate carriers" (*id.*). The petition for certiorari conclusively demonstrates that the distinction between "a burden on interstate commerce" and "a 'burden' on a company which happens to have interstate distribution facilities" (*id.* A-10-11), while verbally facile, is constitutionally untenable. But for the opinion below it would never have occurred to us that such a demonstration would ever again be necessary, since this Court established in *Labor Board* v. *Jones & Laughlin,* 301 U.S. 1, 41-42, that "[w]hen industries organize themselves on a national scale, making their relation to interstate commerce the dominant factor in their activities," they are subject to regulation under the commerce power precisely to prevent "interferences with that commerce".

Perhaps nothing in the opinion below so clearly signals the grave danger which the decision below portends for interstate commerce as does the argument that although the "effect of the ordinance is that the particular interstate systems of distribution used by Procter and Gamble and other detergent companies before the passage of the ordinance can no longer be used" (Pet. A-11), this is not an unconstitutional burden because it results from "the freely chosen geographical locations of their various plants" rather

than from "the requirements of this ordinance" (*id.*). While this reasoning successfully limits to its facts *Pike* v. *Bruce Church, Inc.*, 397 U.S. 137, it appears to run afoul even on its own factual assumptions of *Hood* v. *DuMond*, 336 U.S. 525, 539-540, where a similar argument was made by the State and rejected by this Court. And the "freely chosen" argument is utterly unrealistic: It assumes that if Procter and the Soap and Detergent Association's other members had possessed sufficient foresight, detergent plants could have been erected in a location in which the enactment of the Chicago antiphosphate ordinance would not have created substantial additional costs. Since that assumption is totally unwarranted,[4] the court's reason-

---

[4] The additional production and transportation costs shown on this record arise of necessity if a plant is in a marketing area surrounded by some jurisdictions which allow, and others which forbid the use of phosphates. The variety of permissible detergent formulations that existing laws prescribe only compounds these problems. See Point 3, *infra*.

The record shows that the decison where to manufacture a particular product depends on a variety of factors, only one of which is the cost of transportation. On cross-examination Procter's Sales Manager was asked why a particular heavy-duty laundry detergent, Dash, is made in Cincinnati. He explained (R. 481):

> "In order to manufacture a particular product, it requires that you buy, install and run a certain amount of machinery, that you buy and store raw materials, that you employ the use of a high—in some cases of a high production detergent tower.
>
> Now, these detergent production facilities have optimum production rates; and when you turn them on, sometimes they produce a rather large volume of whatever it is you are making.
>
> To turn them off immediately, when you have made a small amount is a costly proposition.
>
> So, when you have a tower, in this instance in Cincinnati, in the Ivorydale plant, which can produce Dash in such quantities that it is more economic to make it in Cincinnati

ing must be rejected: "The commerce clause does not involve an exercise in the logic of empty categories." *Freeman* v. *Hewit, supra,* 329 U.S. at 254. And even if such a Shangri-La had been found, the companies' exercise of that "free choice" would inevitably have resulted in additional costs if other jurisdictions enacted restrictive legislation.

But we need not belabor the point, for there clearly is no merit in the court's constitutional theory that as long as there "is no impairment of the ultimate ability to transport in interstate commerce in the most efficient and economical manner possible" an ordinance which "might necessitate a change in certain production facilities, * * * does not rise to the level of an unconstitutional burden on interstate commerce" (Pet. A-11). As Mr. Chief Justice Hughes wrote in *Jones & Laughlin, supra,* 301 U.S. at 42:

> "And of what avail is it to protect the facility of transportation, if interstate commerce is throttled with respect to the commodities to be transported!"

3. The court below reasoned that an unconstitutional burden results only from actual, not potential, conflict of legislation in different jurisdictions (Pet. A-11-12), and further that the "importance of uniformity is not as great in the present type of case in terms of interstate commerce" as it is in "cases involving interstate carriers" (*id.* A-12). It was on these grounds that the

---

and have the trans-shipment costs to Chicago than it would be to buy another expensive piece of equipment and duplicate the Ivorydale facilty in Chicago, and run them both at shorter intervals.

These complex factors change from brand to brand and geography to geography, but essentially that is the reason."

The loss of economies of scale is, of course, even more serious for the smaller producers.

court below rejected the plaintiffs' contention that the "rival, conflicting and angry regulations" of phosphates in detergents create an unconstitutional burden on interstate commerce.[5] While the immediate result raises practical problems of the utmost gravity to the Soap and Detergent Association and its members, the adverse impact of the court's holding is not limited to the industry which happens to be the target of the ordinance at issue in this case.

We address ourselves first to the court's statement that conflicting laws affecting production and merchandising are constitutionally more tolerable than conflicting regulations of transportation. This view

---

[5] As the trial court found (Pet. B-3):

> "Similar ordinances have been adopted by various jurisdictions, state and local, in widely separated areas of the United States. As of September 1972, four small municipalities neighboring Chicago, and also the unincorporated area of Lake County, Illinois prohibit the sale of detergents containing any phosphorous. Other neighboring jurisdictions, including the states of Indiana and Michigan, limit the phosphorus content to 8.7%. Several municipalities have repealed or delayed the effective date of their ordinances, and most of the other municipalities surrounding Chicago have no restrictions on the sale or use of phosphate detergents.
>
> Nationwide, a patchwork pattern of ordinances and laws has grown up over the past three years ranging from complete prohibition of phosphate detergents in Dade County, Florida, Erie County (Buffalo), New York, and two additional states outside of the Mid-West, and 8.7% limitation in many other localities, and no controls elsewhere. These laws and ordinances have become too numerous and diverse to summarize beyond the date of the stipulation of the parties dated September 26, 1972."

This situation is constantly changing as States and their subordinate jurisdictions consider varying forms of anti-phosphate regulation. Bills which would forbid or limit the use of phosphate detergents are presently pending in the legislatures of approximately nine states and many subordinate jurisdictions.

ignores *National Bellas Hess* v. *Department of Revenue,* 386 U.S. 753, 759-760, as well as *Freeman* v. *Hewit, supra,* 329 U.S. at 256. And insofar as it confines the holdings of *Southern Pacific* v. *Arizona,* 325 U.S. 761, *Morgan* v. *Virginia,* 328 U.S. 373, and *Bibb* v. *Navajo Freight Lines,* 359 U.S. 520 to the transportation industry, the court succumbed to "the danger in our system of law which has grown up from concrete cases rather than from abstract reasoning, of using precedents as principles *per se* and not as illustrations of principle." Chafee, *Progress of the Law—Equitable Relief Against Torts,* 34 Harv. L. Rev. 388, 391 (1921). Here, the governing "principle [is] that our economic unit is the Nation, which alone has the gamut of powers necessary to control of the economy, * * * [and] has as its corollary that the states are not separable economic units." *Hood* v. *DuMond, supra,* 336 U.S. at 537-538. That "uniformity" is as essential to prevent serious impediments to the free flow of commerce" (*Southern Pacific, supra,* 325 U.S. at 775) in the marketing of products as it is in the operation of railroads and trucks, would seem to be sufficiently obvious to deserve judicial notice. In any event, this record amply demonstrates that in the detergent industry laws already enacted have diminished the economies of scale afforded by an unobstructed national market, since they require the production of chemically and physically different formulations for each of several kinds of cleaning products and the disruption of established distribution patterns.

In support of the view that only "actual conflict" is "relevant" the court below cited *Huron Portland*

Cement Co. v. *Detroit,* 362 U.S. 440, 448 (see Pet. A-12, n. 15). This Court there said:

> "And while the appellant argues that other local governments might impose differing requirements as to air pollution, it has pointed to none. The record contains nothing to suggest the existence of any such *competing or conflicting* local regulations." (emphasis added)

For purposes of the present case, it is sufficient that the challenge laid down in the *Detroit* case has been met on this record. And in broader terms, the Court of Appeals has sanctioned burdens on commerce which have previously been deemed intolerable, for it disregarded the *Detroit* opinion's reference to "competing" regulations, and treated as a "conflict" only the situation where obedience to one law would require "violation" of another (see Pet. A-11):

> "It is claimed that Milwaukee has an ordinance that not only restricts phosphates, but also prohibits highly alkaline detergents which have been used as substitutes for phosphate detergents. But there is no evidence in the record to prove that any phosphate substitutes used by the appellees in Chicago violate Milwaukee's ordinance."

Yet, in *Bibb,* adherence to the mud-flap regulations of different states was not legally forbidden, but rather occasioned serious "delay and inconvenience" (359 U.S. at 529); in *Southern Pacific* trains which satisfied Arizona's size limits could lawfully have operated in California and New Mexico, for those States did not require *minimum* train sizes; and it was sufficient in *National Bellas Hess* that States other than Illinois might subject business in a "virtual welter of complicated obligations" (386 U.S. 760).

Additionally, the court's reading of *Detroit,* that "potential" disparity in legislation may be disregarded in determining whether commerce is unconstitutionally burdened is inconsistent with prior decisions,[6] as well as the more recent *National Bellas Hess* case where, as in *Detroit,* Mr. Justice Stewart wrote for this Court.[7]

4. The only burden theory in which the court below found "some merit" (Pet. A-13) was that the Chicago ordinance has an extraterritorial effect because warehouses which service retail grocery chains in Chicago and its environs refused to stock both phosphate and non-phosphate detergents of the same manufacturer. This reduced Procter's sales and of course withdrew from potential purchasers outside Chicago a detergent formula that may legally be sold and bought there.[8] The

---

[6] See *e.g., Southern Pacific Arizona, supra,* 325 U.S. at 775: ("If one state may regulate train lengths, so may all the others, and they need not prescribe the same maximum limitation"); *Freeman* v. *Hewit, supra,* 329 U.S. at 256: ("The immunities implicit in the Commerce Clause and the potential taxing power of a State can hardly be made to depend, in the world of practical affairs, on the shifting incidence of the varying tax laws of the various States at a particular moment.")

[7] "[I]f Illinois can impose such burdens, so can every other State, and so, indeed, can every municipality, every school district, and every other political subdivision throughout the Nation with power to impose sales and use taxes. The many variations in rates of tax, in allowable exemptions, and in administrative and recordkeeping requirements could entangle National's interstate business in a virtual welter of complicated obligations to local jurisdictions. . . ." 386 U.S. at 759-760, emphasis added.

[8] The District Court found:

> "Modern-day detergents were developed and patented after World War II by chemists who discovered that phosphates when combined with other materials would clean better than soap, particularly in hard water. Detergents contributed to the development of the automatic washing machines and dish-

Court admitted that thereby "the free flow in commerce of a particular product is disrupted," which "must be deemed a burden on interstate commerce" (*id.*). The Court determined, however, that this burden is only "slight" (*id.* A-15), the critical conclusion under its "compromise", see *id.* A-9.

The major prop of the Court's discussion of the extraterritoriality problem is its elaborate speculation that warehousemen might ultimately choose to change their present practice and to undertake to distribute both phosphate and non-phosphate detergents of the same manufacturer (Pet. A-14-15). It is even suggested that petitioner Procter "and the other two large detergent manufacturers are huge companies that could exert at least some 'leverage' on these warehouses" (*id.* A-14). Even if these companies could lawfully exercise in this manner the economic power thus casually attributed to them (but cf. *Fortner Enterprises* v. *United States Steel Corp.*, 394 U.S. 495, 502-504), the

---

washers, and the two complementary lines of products flourished. * * *

The evidence is clear that a detergent made with phosphate is a more effective cleaning agent than non-phosphate detergents when used with Chicago's water and is not at all harmful to the persons using it or wearing clothes or eating from utensils washed in it." (Pet. B-6)

The Court of Appeals did not disturb these findings.

The industry has spent large sums to develop non-phosphate substitutes which will match the cleaning efficiency of phosphates. The most promising substitute material is Nitrilotricetate (NTA) (see R. 825). It was stipulated that: "Use of NTA has been held up pursuant to the urging of the Surgeon General of the United States, pending further investigation of its safety. Recently a government commission has reiterated the request to withhold NTA from the market pending further investigation." (R. 197) At the present time the Department of Health, Education and Welfare is still studying NTA and has not given the industry clearance to use it.

ordinance would still make it impossible for those among their smaller competitors who can manage to produce both phosphate and non-phosphate detergents to market them in the Chicago area.[9] We need not pursue this point, however, for this Court long ago held, in a unanimous opinion by Mr. Justice Holmes, that the substantiality or insubstantiality of a burden on commerce does not depend on the actions of third persons over which the regulated party has no control:

> "These judgments must be taken as they read upon their face. They are not conditional orders to raise the bridge if the defendants can obtain the consent of parties not before the court, and of one authority, at least, not subject to its control. They cannot be qualified by speculation as to what is likely to happen in fact." *Kansas City Southern Railway Co.* v. *Kaw Valley Drainage District of Wyandotte County, Kansas*, 233 U.S. 75, 78.

Since the burden which the Chicago ordinance imposes on interstate commerce in detergents cannot be measured by wishing away the practices of the grocery warehouse industry, the Court's other endeavors to belittle the ordinance's extraterritorial impact can be dealt with summarily. Two of those arguments appear to be inconsistent with the Court's general approach to the burden issue. First, the Court relied on the circumstance that there are "[o]ther jurisdictions in the Chicago marketing zone [which] have

---

[9] We do not regard it as mere happenstance that the Court's reasoning led it in a direction fraught with danger to competition in the market for detergents. While it is inappropriate to do so in a brief supporting a petition for certiorari, we propose to demonstrate, if we have the opportunity to present a brief on the merits, that local regulations restricting the sale of nationally marketed products have an inevitably adverse effect on competition far beyond the immediate locale of regulation.

limitations on phosphate detergents" (Pet. A-13); yet, the Court elsewhere said that uniformity of legislation is of lesser importance with respect to production and merchandising than with respect to transportation (*id.* A-11-12, see pp. 8-9, *supra*). Second, the Court pointed to "the possibility that manufacturers might be able to 'dropship' directly from the plant to stores in some areas [, although] this might not be the customary or most economical procedure * * *" (*id.* A-13-14). What now of the Court's assurance that "[t]here is no impairment of the ultimate ability to transport in interstate commerce in the most efficient and economical manner possible" (*id.* A-11)?

The Court also deemed it to be "important", albeit "not determinative", that the burden of extraterritoriality "is one that was not intended by the City Council" (Pet. A-13).[10] Whether and how much a law burdens interstate commerce is an objective fact "in the world of practical affairs" (*Freeman* v. *Hewit*, 329 U.S. at 256).[11] This Court should make clear that consideration of that issue is not to be confused by injecting the foreign element of subjective intent.[12]

---

[10] This did not inhibit the City from attempting to support the ordinance in the Court of Appeals "on the basis of this extraterritorial coercion" (Pet. A-19, n. 23), an argument which the Court properly rejected (*id.*).

[11] In *Freeman* this Court struck down a tax imposed by a seller State because "potential taxation by consumer States" (*id.* at 257) created an unconstitutional burden on commerce. No inquiry was made whether the seller State intended that such multiple taxation would result; presumably the seller State was either indifferent to the consumer State's policy or, more likely, preferred that the consumer State impose no tax.

[12] For the sake of clarity we emphasize that the purpose of that law—that is, the local policy it is enacted to promote—may, of course, be considered in deciding whether that burden is unconstitutional, though it cannot be decisive, *e.g.*, *Minnesota* v. *Barber*, 136 U.S. 313, 319.

CONCLUSION

The last decade has seen growing public concern over the environmental effects of the public consumption of otherwise wholly beneficial products, and legislative bodies at every state and local level have responded. It is symptomatic of the force of this movement, and might have bemused Carl Sandburg, that it is the great city of Chicago which has here endeavored "to encourage a pastoral instead of an industrial society." *Freeman* v. *Hewit, supra,* 329 U.S. at 252. But this development, though wholesome and overdue, is not without countervailing costs, and insofar as local environmental regulations affect nationally produced and marketed products, it inevitably jeopardizes the "material success that has come to inhabitants of the states which make up this federal free trade unit" and which "has been the most impressive in the history of commerce." *Hood* v. *DuMond, supra,* 336 U.S. at 538.

Of course, Congress has power to reconcile these tensions between the national economy and local or regional environmental interests. Unless and until Congress acts, however, it is, as it historically has been, the responsibility of the courts and most particularly this Court, to safeguard the values which the Commerce Clause was adopted to promote. Because of the increasing importance of the problem which this case typifies, state and local legislative bodies require guidance so that they may confine their environmental enactments within constitutional bounds. And the lower courts, too, need enlightenment in dealing with what was acknowledged below to be "a very difficult constitutional problem" (Pet. A.-20). The opinion below, though conscientious, does not provide a constitutionally tenable answer, because, as we have sought to show

herein, in elaboration of the Petition, it departed from this Court's precedents in evaluating the burden which the Chicago ordinance imposes on interstate commerce in detergents. Above all, we submit that only constitutional chaos can result if regulation and adjudication are to proceed from the assumption that the production and sale of goods in interstate commerce is less worthy of protection from interference than transportation (Pet. A-10; A-12)— a reading of the Commerce Clause which last prevailed here in *Carter* v. *Carter Coal Co.*, 298 U.S. 238.

For the reasons stated in the Petition and herein, the Petition for Certiorari should be granted.

Respectfully submitted,

ALAN S. WARD
Baker, Hostetler, Frost
& Towers
1425 H Street, N.W.
Washington, D.C. 20005

March, 1975